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District of Nevada
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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LESLIE R. LEONARDO
Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-00279-CWH

**JOINT STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME FOR
DEFENDANT TO RESPOND TO PLAINTIFF'S
MOTION FOR REMAND**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from August 29, 2018 to **August 30, 2018**. This is Defendant's third request for extension. Good cause exists to grant Defendant's request for extension. Following the third death in the last three months in Counsel's family and an emergency family matter of Counsel's immediate family member that required emergency stay and surgery during the same week, Counsel took some additional personal leave last week and was out of the office to recoup from the several family tragedies. Counsel also has over 85+ pending social security cases, which require two or more dispositive motions a week until mid-

1 October, as well as a pending Ninth Circuit case (due in early October) and several civil rights matters
2 that require immediate investigation. Due to current workload demands and unanticipated leave,
3 Counsel did not have sufficient time to finalize Defendant's response. As such, Defendant needs
4 additional time to adequately review the transcript and properly respond to Plaintiff's Motion for
5 Remand. Defendant makes this request in good faith with no intention to unduly delay the
6 proceedings. Counsel apologizes for the belated request, but did not anticipate taking additional leave.
7 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.
8
9

10 Respectfully submitted,

11 Dated: August 29, 2018

/s/ *Edward A. Wicklund
(*as authorized by email on August 29, 2018)
EDWARD A. WICKLUND
Attorney for Plaintiff

15 Dated: August 29, 2018

DAYLE ELIESON
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

19 By /s/ Tina L. Naicker
20 TINA L. NAICKER
21 Special Assistant U.S. Attorney
22 Attorneys for Defendant

ORDER

23 APPROVED AND SO ORDERED:

24 DATED: August 30, 2018


HON. CARL W. HOFFMAN
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the
3 **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME FOR**
4 **DEFENDANT TO RESPOND TO PLAINTIFF'S MOTION FOR REMAND** on the date and via
5 the method of service identified below:

6 **CM/ECF:**

7 Edward A. Wicklund
8 Olinsky Law Group
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20 Attorneys for Plaintiff

21 Respectfully submitted this 29th day of August 2018,

22 /s/ Tina L. Naicker
23 TINA L. NAICKER
24 Special Assistant United States Attorney
25
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